

DAVID L. ANDERSON (CABN 149604)
United States Attorney

HALLIE HOFFMAN (CABN 210020)
Chief, Criminal Division

CHRISTINA LIU (CABN 308362)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7199
FAX: (415) 436-7234
christina.liu@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NO. CR 19-584 RS
)	
Plaintiff,)	STIPULATION AND ORDER TO EXCLUDE
)	TIME UNDER THE SPEEDY TRIAL ACT
v.)	
)	
JONATHAN FLORES,)	
)	
Defendant.)	

On November 3, 2020, the parties appeared before the Court in this matter for a telephonic status conference. The Court scheduled the next hearing in this case as a telephonic hearing on December 1, 2020, for the purpose of setting a trial date.

The parties stipulate and agree that the United States has provided discovery materials and an opportunity for case resolution to defense counsel, who is in the process of reviewing the case materials and the resolution opportunity with defendant.

Thus, as noted at the November 3, 2020 hearing, the parties stipulate and agree it would be appropriate to exclude the time from November 3, 2020 through December 1, 2020 under the Speedy Trial Act to allow for effective preparation of counsel, taking into account the exercise of due diligence. *See* 18 U.S.C. §§ 3161(h)(7)(A), (B)(iv). The parties further stipulate and agree that the ends of justice

served by excluding the time from November 3, 2020 through December 1, 2020 from computation under the Speedy Trial Act outweigh the best interests of the public and defendant in the prompt resolution of this case. *See id.*

The undersigned Assistant United States Attorney certifies that she has obtained approval from counsel for defendant to file this stipulation and proposed order.

IT IS SO STIPULATED.

DATED: November 12, 2020

/s/ Christina Liu

CHRISTINA LIU

Assistant United States Attorney

DATED: November 12, 2020

/s/ with permission

SHAWN HALBERT

Attorney for Defendant Jonathan Flores

ORDER

Based upon the representations of counsel and for good cause shown, the Court finds that failing to exclude the time from November 3, 2020 through December 1, 2020 would unreasonably deny defense counsel and defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. *See* 18 U.S.C. §§ 3161(h)(7)(A), (B)(iv).

The Court further finds that the ends of justice served by excluding the time from November 3, 2020 through December 1, 2020 from computation under the Speedy Trial Act outweigh the best interests of the public and defendant in a speedy trial. *See* § 3161(h)(7)(A).

Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from November 3, 2020 through December 1, 2020 shall be excluded from computation under the Speedy Trial Act. *See id.*

IT IS SO ORDERED this 12th day of November 2020.


 THE HONORABLE RICHARD SEEBORG
 United States District Judge